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28 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA REED, and COASTAL PROTECTION
RANGERS, INC.

18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20
21 CORY SPENCER, an individual;
22 DIANA MILENA REED, an
23 individual; and COASTAL
24 PROTECTION RANGERS, INC., a
25 California non-profit public benefit
corporation,

26 Plaintiffs,

27 v.

28 LUNADA BAY BOYS; THE

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' PROPOSED
PROTECTIVE ORDER AND
PROPOSED STIPULATION AND
ORDER REGARDING PLAINTIFFS'
MOTION TO COMPEL
PRODUCTION BY DEFENDANT
BRANT BLAKEMAN**

Hon. Rozella A. Oliver

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

1 INDIVIDUAL MEMBERS OF THE
 2 LUNADA BAY BOYS, including but
 3 not limited to SANG LEE, BRANT
 4 BLAKEMAN, ALAN JOHNSTON
 5 AKA JALIAN JOHNSTON,
 6 MICHAEL RAE PAPAYANS,
 7 ANGELO FERRARA, FRANK
 8 FERRARA, CHARLIE FERRARA,
 9 and N. F.; CITY OF PALOS
 10 VERDES ESTATES; CHIEF OF
 11 POLICE JEFF KEPLEY, in his
 representative capacity; and DOES
 1-10,

10 Defendants.

12 In compliance with this Court's January 25, 2017, Plaintiffs met and
 13 conferred with counsel for Defendant Blakeman in an attempt to reach
 14 consensus regarding a protective order and proposed protocol for the review
 15 of data responsive to Plaintiffs' request for production of documents.

16 While the parties differ in their proposed review protocol, it appears
 17 their protective orders are substantially similar. Prior to this filing, Plaintiffs
 18 had accepted Defendant Blakeman's proposed protective order and
 19 suggested minor non-substantive changes due to grammatical or spelling
 20 errors and spacing modifications in the version proposed by Defendant
 21 Blakeman. For reasons unknown at the time of this filing, Defendant
 22 Blakeman rejected Plaintiffs' proposed minor modifications. Plaintiffs
 23 therefore submit their proposed protective order and proposed review
 24 protocol for this Court's consideration.

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1 DATED: February 24, 2017

HANSON BRIDGETT LLP

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Bv: /s/ Samantha D. Wolff

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KURT A. FRANKLIN

SAMANTHA D. WOLFF

Attorneys for Plaintiffs

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CORY SPENCER, DIANA MILENA

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REED, and COASTAL PROTECTION

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RANGERS, INC.

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